

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BARBARA HANDSCHU, RALPH DiGIA, ALEX  
McKEIVER, SHABA OM, CURTIS M. POWELL,  
ABBIE HOFFMAN, MARK A. SEGAL, MICHAEL  
ZUMOFF, KENNETH THOMAS, ROBERT RUSCH,  
ANNETTE T. RUBENSTEIN, MICKEY SHERIDAN,  
JOE SUCHER, STEVEN FISCHLER, HOWARD  
BLATT, ELLIE BENZONI, on behalf of  
themselves and all others similarly  
situated,

71 Civ. 2203 (CSH)

DECLARATION OF  
SHAMIUR RAHMAN

Plaintiffs,

-against-

SPECIAL SERVICES DIVISION, a/k/a  
Bureau of Special Services; WILLIAM  
H.T. SMITH; ARTHUR GRUBERT; MICHAEL  
WILLIS; WILLIAM KNAPP; PATRICK  
MURPHY; POLICE DEPARTMENT OF THE  
CITY OF NEW YORK; JOHN V. LINDSAY;  
and various unknown employees of the  
Police Department acting as  
undercover operators and informers,

Defendants.

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SHAMIUR RAHMAN, for his declaration pursuant to 28  
U.S.C. 1746, states as follows:

1. I am a native of Queens, New York. My family is  
from Bangladesh. I speak "Banglish" (a mixture of Bengali  
and English) with my family, but my first language is  
English. In January 2012, I was recruited by a plainclothes  
officer of the New York Police Department ("NYPD") to serve  
as an informant. At first I thought I was helping to fight

terrorism, but as I saw what I was asked to do, I was more interested in the money I was being paid. I started at \$1000 per month and by the time I quit I was getting around \$1500 per month. I received my instructions from a police officer who called himself "Steve". We met and talked in his car and also communicated by text message. I still have the text messages I exchanged with him in my cell phone.

2. My assignment was to spy on members of the Muslim communities in New York. I was told to use a strategy the police called "create and capture". This meant I was to pretend to be a devout Muslim and start an inflammatory conversation about jihad or terrorism and then capture the response to send to the NYPD. I did this on numerous occasions with people I met at mosques and other locations.

3. As part of my work as an informant I visited many mosques. I took pictures of the people worshipping there and sent the pictures to the NYPD. I was instructed to listen to what the imams said and to report any radical rhetoric. I recorded cell phone numbers from the sign up sheet of people who attended Islamic instruction classes. My NYPD boss Steve never once told me I was collecting too much information, no matter who I was spying on.

4. One of my earliest assignments was to spy on a lecture at the Muslim Student Association at John Jay

College in Manhattan. I was told to report any "buzz words" like jihad or revolution by the speaker. I was also told to monitor the student group itself. My NYPD boss Steve told me to take pictures at the group's events, to determine who belonged to the group and to identify its leadership. I took pictures of people in the group and recorded the license plate numbers of their cars.

5. My NYPD boss Steve told me that the NYPD did not think the John Jay Muslim Student Association was doing anything wrong, they just wanted to make sure. The members of the MSA were religious Muslims, and according to my NYPD boss Steve, the NYPD considers being a religious Muslim a terrorism indicator.

6. On the instructions of my NYPD boss Steve, I attended additional events at John Jay and I travelled to events organized by the Islamic Circle of North America and the Muslim American Society. I was told to spy on the speakers and to collect information about those who attended.

7. On the instructions of my NYPD boss Steve I attended the Muslim Day parade in Manhattan and took pictures of people marching. I sent these pictures to the NYPD.

8. I never saw anyone I spied on do anything illegal, not even littering. At the end of September, 2012, I decided I did not want to spy on people any longer, and I told my NYPD boss Steve that I was quitting. He offered me more money to continue but I declined the offer.

9. I believe that the spying on the Muslim communities in New York by the NYPD Intelligence Division puts everyone at risk. If they are able to continue to target Muslims, they will end up spying on other groups as well.

  
SHAMIUR RAHMAN

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 28, 2012.